

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

N.S. o/b/o W.F.,

Plaintiff,

V

Judge Paul L Maloney  
Magistrate Judge Phillip J. Green  
No. 23-448

## STURGIS PUBLIC SCHOOLS,

Defendant.

1

ELIZABETH K. ABDNOUR (P78203)  
ABDNOUR WEIKER LLP  
*Attorney for Plaintiff*  
500 E. Michigan Ave., Suite 130  
Lansing, MI 48912  
(517) 994-1776  
[liz@education-rights.com](mailto:liz@education-rights.com)

TIMOTHY J. MULLINS (P28021)  
KENNETH B. CHAPIE (P66148)  
GIARMARCO, MULLINS & HORTON, P.C.  
*Attorneys for Defendant*  
101 W. Big Beaver Road, 10th Floor  
Troy, MI 48084-5280  
(248) 457-7020  
[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)  
[kchapie@gmhlaw.com](mailto:kchapie@gmhlaw.com)

JACQUELYN N. KMETZ (P83575)  
BARGER & GAINES  
*Attorney for Plaintiff*  
90 North Broadway, Ste. 320  
Irvington, NY 10533  
(914) 902-5918  
[jacquelyn@bargergaines.com](mailto:jacquelyn@bargergaines.com)

**STIPULATION AND ORDER EXTENDING TIME FOR PARTIES TO DISCLOSE  
IDENTIFICATION OF EXPERT WITNESSES**

IT IS HEREBY STIPULATED AND AGREED by the undersigned counsel for Plaintiff and Defendants that the deadline for the parties to disclose the identification of their expert witnesses is extended as follows:

- Plaintiffs' disclosures of expert witnesses is extended from January 5, 2024 to January 22, 2024.
- Respondent's disclosures of expert witnesses is extended from February 2, 2024 to February 19, 2024.

Plaintiff respectfully requests this additional time as their previously-identified special education expert has recently provided notice his employer is no longer allowing him to serve as an expert witness. Plaintiffs are in the process of identifying a new expert.

No Party will be prejudiced by extending the disclosure deadlines in this matter and Defendants do not oppose the proposed extension.

Upon stipulation of the parties, and the Court being otherwise advised in the premises;

IT IS HEREBY ORDERED that the dates for the parties to disclose the identification of their expert witnesses is extended as follows:

- Plaintiffs' disclosures of expert witnesses is extended from January 5, 2024 to January 22, 2024.
- Respondent's disclosures of expert witnesses is extended from February 2, 2024 to February 19, 2024.

Date: December 26, 2023

/s/ Paul L. Maloney  
U.S. District Court Judge

I HEREBY STIPULATE TO ENTRY  
OF THE ABOVE ORDER.

/s/ Jacquelyn Kmetz  
Jacquelyn Kmetz (P83575)  
BARGER & GAINES

Attorney for Plaintiff  
90 North Broadway, Ste. 320  
Irvington, NY 10533  
(914) 902-5918  
[jacquelyn@bargergaines.com](mailto:jacquelyn@bargergaines.com)

/s/ *Kenneth B. Chapie*

Timothy J. Mullins (P28021)  
Kenneth B. Chapie (P66148)  
GIARMARCO, MULLINS & HORTON, P.C.

*Attorneys for Defendants*

101 W. Big Beaver Rd., 10<sup>th</sup> Floor  
Troy, MI 48084-5280  
(248) 457-7020  
[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)  
[kchapie@gmhlaw.com](mailto:kchapie@gmhlaw.com)